

REMARKS

The Office Action rejects claims 1-3, 5, 7-10, and 12-28 under 35 U.S.C. § 102(e) as being anticipated by U.S. patent no. 6,973,057 to Forslow ("Forslow"). Also, the Office Action rejects claims 4, 6, and 11 under 35 U.S.C. § 103(a) as being unpatentable over Forslow in view of by U.S. patent no. 6,970,943 to Subramanian ("Subramanian").

This response amends claim 1 to recite additional details, amends most of the claims depending from claim 1, cancels claims 13-28, and enters new claims 29-42.

35 U.S.C. § 102(e)

Claim 1 recites a network device with "a forwarding plane processor to maintain a binding cache" and a "forwarding table." In addition, the binding cache and the forwarding table serve different purposes and contain different types of information. Specifically, the binding cache associates "original destination addresses with respective replacement destination address, based on information obtained from one or more routers." By contrast, the forwarding table associates "destination addresses with output interfaces of the network device." (Claim 1.)

With regard to forwarding tables, Forslow explains that they are used to define associations between the input and output interfaces of a router, based on routing information obtained from "other routers," so that packets can be forwarded to other routers, based on information contained in the packet's header (col. 4, lines 26-30). Forslow's "forwarding table" therefore seems to correspond roughly to claim 1's "forwarding table."

Forslow's routing tables, by contrast, are used "to associate or 'bind' the mobile's home address, current care-of address, and a registration lifetime" (col. 3, lines 5-9). Consequently, Forslow's "routing table" seems to correspond roughly to claim 1's "binding cache."

However, claim 1 recites that both the binding cache and the forwarding table are maintained by the forwarding plane processor. The cited portions of Forslow do not disclose this feature. Specifically, the Office Action cites to Figure 5 of Forslow with regard to claim 1. That figure shows a "routing table 70" within a "control engine 60,"

and an "MPLS forwarding table 76" within "forwarding engine 62." Thus, Forslow implies that the forwarding engine maintains the forwarding table, but the forwarding engine does not maintain the routing table; instead, the routing table is apparently maintained by the control engine.

For at least the foregoing reasons, Forslow does not anticipate each and every feature of claim 1. Independent claims 29 and 36 also involve a forwarding plane processor to maintain a "binding cache" and a "forwarding table." Consequently, Forslow does not anticipate any of the independent claims.

In addition, the independent and dependent claims recite additional features that are not disclosed by Forslow. For instance, claims 11 and 12 have been amended to remove the disjunctive treatment of some of the recited features.

Moreover, claim 12 recites that the forwarding plane processor also performs operations such as maintaining the binding cache, in response to instructions from the control plane processor. The cited portions of Forslow, however, say nothing about using a forwarding plane to maintain the binding cache. Instead, they seem to teach away from that idea, since Figure 5 shows the routing table (which, as indicated above, seems to correspond roughly to claim 1's "binding cache") within the control engine, not within the forwarding engine. Thus, Forslow seems to teach that the control engine should maintain the routing table, not the forwarding engine.

For at least the foregoing reasons, the rejections under 35 U.S.C. § 102(e) should be withdrawn.

35 U.S.C. § 103(a)

In the rejections of claims 4, 6, and 11, the Office Action cites to Subramanian. This response cancels claim 4. In addition, the Office Action does not rely on Subramanian for the features discussed above concerning maintenance of both the binding cache and the forwarding table by the forwarding processor. Consequently, the Office Action does not make out a *prima facie* case of obviousness for claims 6 and 11.

CONCLUSION

Applicant respectfully requests reconsideration of the present application in light of the above amendments and remarks. If the Examiner has any questions, the Examiner is encouraged to contact the undersigned at (512) 732-3927.

Respectfully submitted,

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